

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
GREENBELT DIVISION**

In re:

WARDMAN HOTEL OWNER, L.L.C.,

Debtor.

Chapter 11 Case

Case No. 21-10023 (JTD)

Pending in the United States
Bankruptcy Court for the District of
Delaware

MARRIOTT HOTEL SERVICES, INC.
10400 Fernwood Road
Bethesda, Maryland 20817

Adv. Pro. No. 21-00043

Plaintiff,

-against-

WARDMAN HOTEL OWNER, L.L.C.
4747 Bethesda Avenue, Suite 200
Bethesda, Maryland 20814

PACIFIC LIFE INSURANCE COMPANY
700 Newport Center Drive
Newport Beach, California 92660

Defendants.

NOTICE OF FILING OF STATEMENT PURSUANT TO FED. R. BANKR. P. 9027(e)(3)

PLEASE TAKE NOTICE that the undersigned counsel for Marriott Hotel Services, Inc. (“Marriott”), party-in-interest in the above-referenced matter, caused to be filed with the United States Bankruptcy Court for the District of Maryland the *Statement of Marriott Hotel Services, Inc. Pursuant to Rule 9027(e)(3) of the Federal Rules of Bankruptcy Procedure* (the “Rule 9027 Statement”). A copy of the Rule 9027 Statement is attached hereto.

Dated: March 3, 2021

Respectfully submitted,

By: /s/ Colleen Coffman Correal

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Defendants.

**STATEMENT OF MARRIOTT HOTEL SERVICES, INC. PURSUANT TO
RULE 9027(e)(3) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Marriott Hotel Services, Inc. ("Marriott"), plaintiff in Civil Action No. 483406-V from the Circuit Court for Montgomery County, Maryland (the "State Court Action"), by and through its undersigned counsel, submits this statement (the "Statement"), pursuant to Rule 9027(e)(3) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), to the Notice of Removal, dated February 18, 2021 (the "Notice of Removal"), filed by co-defendant Pacific Life Insurance Company [ECF No. 2].

Response

1. The Notice of Removal contends that the claims asserted by and against Marriott in the State Court Action both “arise under” and “relate to” the pending chapter 11 bankruptcy case of Wardman Hotel Owner L.L.C. filed on January 11, 2021 in the United States Bankruptcy Court for the District of Delaware. *See* ECF No. 2 at ¶ 2. The statutory bases alleged for these contentions are 28 U.S.C. § 157(b), § 1334(b), and § 1452.

2. Bankruptcy Rule 9027(e)(3) provides:

Any party who has filed a pleading in connection with the removed claim or cause of action, other than the party filing the notice of removal, shall file a statement that the party does or does not consent to entry of final orders or judgment by the bankruptcy court. A statement required by this paragraph shall be signed pursuant to Rule 9011 and shall be filed not later than 14 days after the filing of the notice of removal. Any party who files a statement pursuant to this paragraph shall mail a copy to every other party to the removed claim or cause of action.

Fed. R. Bankr. P. 9027(e)(3).

3. In response to the requirements of Bankruptcy Rule 9027(e)(3) Marriott states as follows: Marriott does not consent to the entry of final orders or judgments by the Bankruptcy Court.

4. The Notice of Removal contains commentary and characterizations that do not require a response in order to satisfy the requirements of Bankruptcy Rule 9027(e)(3). Accordingly, Marriott will not, through this Statement, respond to the mischaracterizations and gratuitous commentary included in the Notice of Removal. Marriott reserves the right and opportunity to do so if and when necessary or appropriate.

RESERVATION OF RIGHTS

5. Marriott reserves the right to amend, modify, or supplement this Statement in all respects. Nothing herein constitutes a waiver of Marriott's rights or remedies.

Dated: March 3, 2021

Respectfully submitted,

By: /s/ Colleen Coffman Correal

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Attorneys for Marriott Hotel Services, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 3rd Day of March, 2021, a copy of the foregoing
was emailed and mailed first class to:

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